



## Department of Energy

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OCT 29 1999

Mr. Paul Pardi, Hazardous Waste Group Leader  
Ohio Environmental Protection Agency  
Division of Hazardous Waste Management  
401 East 5<sup>th</sup> Street  
Dayton, OH 45402-2911

DOE-1142-99

Dear Mr. Pardi:

### **INVENTORY REMOVAL AND DECONTAMINATION OF PLANT 8 WAREHOUSE (BUILDING 80, HAZARDOUS WASTE MANAGEMENT UNIT #29)**

This letter serves as notification of the Fernald Environmental Management Project's (FEMP) intent to initiate decontamination activities at Plant 8 Warehouse (Building 80, Hazardous Waste Management Unit (HWMU) #29). This building is currently identified in the FEMP's Resource Conservation and Recovery Act (RCRA) Part B Permit Application for the storage of containers of hazardous waste with and without free liquids. Removal of waste inventory and decontamination of the storage area is necessary to accommodate Nuclear Materials Disposition (NMD) repackaging operations. Decontamination of the storage area will be conducted consistent with As Low As Reasonably Achievable (ALARA) practices, and will allow Building 80 to be used for purposes other than mixed waste treatment and storage.

#### **Background**

Building 80 is a single-story rectangular building consisting of a structural steel frame with corrugated metal siding and flooring on a reinforced concrete base and floor. It is located on the north side of First Street across from the Pilot Plant Warehouse. The warehouse was constructed in 1989 for use as a hazardous waste container storage facility. Initially, the building was used primarily for the storage of containers of hazardous waste without free liquids. In 1996, Building 80 was upgraded to store hazardous waste with free liquids. These upgrades included the construction of a secondary containment dike and the re-application of floor sealant. Most recently, solvent extraction of mixed/Polychlorinated Biphenyl (PCB) wastes was conducted in Building 80 as part of the Organic Extraction Project (OEP).

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### Spill History

A review of facility release reports indicates that only two releases of hazardous waste have been reported in Building 80 since 1989. One release, which occurred in 1990, involved approximately one ounce of hazardous waste that seeped from the bottom of a drum seam onto a pallet. The released waste never reached the floor of the building beneath the pallet. The second release occurred in 1994, and involved approximately one pound of liquid, from a grit blast residue drum that was characterized as D008 (lead). The liquid was promptly absorbed using pads. Both drums associated with the releases were overpacked.

Vessels containing mixed waste from the OEP were transported from Plant 6 to Building 80 for treatment in 1997. The waste was placed in a geotextile bag overpacked into a treatment vessel so that there was minimal potential for release of hazardous waste constituents during treatment. Vessels containing the treated waste were transported back to Plant 6 for interim staging.

Inspection logs for Building 80 are available for 1989 and from July 1991 to the present. A review of these inspection logs indicated that HWMU inspectors noted cracks in the floor of Building 80 in the mid-1990s. According to Flour Daniel Fernald, Inc. (FDF) personnel working in Building 80 during this time period, these were very small hairline cracks and occurred primarily around the expansion joints. Work orders were issued and these cracks have been repaired. A recent walkthrough of Building 80 confirmed that the secondary containment was intact with no evidence of breaching.

### Remedial Actions

Decontamination of Building 80 will occur in two phases. Initially, one-third of the warehouse will be decontaminated to accommodate the first phase of NMD repackaging operations. The remaining portion of the building currently contains equipment from the OEP. This equipment has been decontaminated and is planned to be removed from Building 80 by January 2000. Decontamination of this area will occur after the equipment has been removed from the building.

Prior to initiating decontamination activities, containers of hazardous waste will be removed from the area. For the first phase of decontamination, hazardous waste containers have been relocated to the opposite end of Building 80 prior to transport to a RCRA storage area identified in FEMP's RCRA Part B Permit Application. Decontamination of each area will be achieved by using a wet vacuum/floor scrubber to clean the secondary containment area. Based on an evaluation of the spill history and inspection logs, it has been determined that there is minimal potential for release of hazardous waste constituents to Building 80. Therefore, sampling of the decontamination rinseate will not be required.

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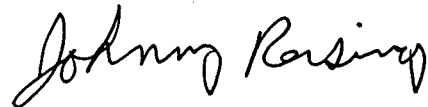
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Note that these activities will not constitute final closure of Building 80. Final closure of this unit will be addressed under the RCRA/Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Integrated Process in accordance with the June 1996 Director's Findings and Orders (DFO) and the Operable Unit 3 (OU3) Integrated Remedial Design/Remedial Action (RD/RA) Work Plan. Building 80 is currently scheduled for Decontamination and Dismantlement (D&D) as part of the Plant 8 Complex. Any remaining issues relative to the remediation of this unit will be addressed in the Plant 8 Complex Implementation Plan. This plan is scheduled for submittal to the Ohio Environmental Protection Agency (OEPA) by October 2001.

Building 80 will continue to be listed in the FEMP's RCRA Part B Permit Application for the storage of containers of hazardous waste in case the storage capacity is needed at a later date. The OEPA will be notified prior to re-establishing the area for hazardous waste storage. FEMP will conduct annual inspections of the storage area, while not used for hazardous waste storage, and will keep copies of the inspection forms in the RCRA Operating Record.

If you have any questions or require additional information, please contact Shannon Kaster at (513) 648-3157.

Sincerely,



Johnny W. Reising  
Fernald Remedial Action  
Project Manager

FEMP:Kaster

cc:

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